

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

FAINESS B. LIPENGA,
Plaintiff,

v.

JANE N. KAMBALAME,
Defendant.

CIVIL ACTION NO. 8:14-cv-3980

**PLAINTIFF'S RENEWED MOTION
FOR ENTRY OF DEFAULT**

Judge George Hazel

PLAINTIFF'S RENEWED MOTION FOR ENTRY OF DEFAULT

This action arises out of the illegal trafficking, forced labor, and tortious treatment of Fainess Bertha Lipenga ("Plaintiff") at the hands of Jane Ngineriwa Kambalame ("Defendant" or "Ms. Kambalame") while the latter was a diplomat at the Embassy of the Republic of Malawi in Washington, D.C. from May 2004 to January 2007.

On December 28, 2015, this Court ordered Plaintiff to serve Defendant, Jane Kambalame, with process by 1) emailing copies of the summons, Complaint, and the Court's Memorandum Opinion and Order to jkambalame@aol.com; and 2) transmit copies of the summons, Complaint, and the Court's Memorandum Opinion and Order to <https://www.facebook.com/jkambalame>. ECF No. 18.

On December 30, 2015, Plaintiff's Counsel complied with the Court's order by sending an email to jkambalame@aol.com and a Facebook message to <https://www.facebook.com/jkambalame> attaching copies of the summons, Complaint, and the Court's Memorandum Opinion and Order. *See* ECF No. 19-1.

Pursuant to the summons, Defendant was entitled to 21 days from the date of service to file an answer. To date, no notice of appearance or responsive pleading has been served by

Defendant upon attorneys for Plaintiff in this case. Thus, pursuant to Fed. R. Civ. P. 55(a), Plaintiff moves for an entry of default as Defendant has been properly served pursuant to Fed R. Civ. P. 4(f)(3) and has failed to plead or otherwise defend in this action.

Dated: Jan. 28, 2015

Respectfully Submitted,

/s/ Lindsay E. Reimschuessel
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